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Attorneys for Creditors Learning Annex  
Holdings, LLC, Learning Annex, LLC,  
and Learning Annex L.P.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF WYOMING**

-----X  
In re :  
RICH GLOBAL, LLC : Case No. 12-20834 (PJM)  
Debtor. :  
-----X

**CREDITORS LEARNING ANNEX HOLDINGS, LLC, LEARNING ANNEX, LLC  
AND LEARNING ANNEX L.P.'S LIST OF EXHIBITS AND WITNESSES FOR  
APRIL 2, 2019 EVIDENTIARY HEARING**

Pursuant to Federal Rule of Bankruptcy Procedure 9014 and Local Rule 9070-1,  
Creditors Learning Annex Holdings, LLC, Learning Annex, LLC and Learning Annex L.P.  
(collectively "Learning Annex") hereby submit the following list of exhibits (the "Exhibit List")  
identifying documents Learning Annex anticipates offering, or that it may offer if the need

arises, and the following list of witnesses (the “Witness List”) identifying individuals Learning Annex anticipates calling, or who it may call if the need arises, to present testimony at evidentiary hearing scheduled for April 2, 2019 (the “Evidentiary Hearing”) relating to Tracy L. Zubrod’s (the “Trustee”) Motion to Approve Settlement of Disputes between the Trustee and Robert Kiyosaki, Kim Kiyosaki, Pele-Kala Corporation, Cashflow Technologies, Inc., BI Capital, LLC, and Rich Dad Operating Company, LLC, filed on January 8, 2019 (Dkt. No. 336). Learning Annex reserves the right to supplement this Exhibit List and Witness List or to modify them as needed to address rulings by the Court and evidence presented at the Evidentiary Hearing. Learning Annex also reserves its right to use any document included on the exhibit lists submitted by any other party to be heard at the Evidentiary Hearing, including (but not limited to) any document included in the exhibit list submitted by the Trustee. This Exhibit List does not include documents or other evidence that may be used solely for the purpose of impeachment or rebuttal. Learning Annex also reserves its right to seek testimony from any witness included on the witness lists submitted by any other party to be heard at the Evidentiary Hearing, including (but not limited to) any witness included in the witness list submitted by the Trustee.

**LEARNING ANNEX EXHIBIT LIST**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>SUBJECT TO PROTECTIVE ORDER</b>
A	Term Sheet of Burford Capital LLC, February 15, 2019	No
B	Expert Report of Kotzin Valuation Partners, and schedules, exhibits, and appendices thereto, dated March 30, 2018	Yes
C	Expert Report of Cordes & Company, and schedules, exhibits and appendices thereto, dated March 30, 2018	Yes
D	Expert Rebuttal Report of Kotzin Valuation Partners, and exhibits thereto, dated June 15, 2018	Yes

EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
E	Expert Rebuttal Report of Cordes & Company, and exhibits thereto, dated June 15, 2018	Yes
F	U.S. Securities and Exchange Commission Form 10-K of Legacy Education Alliance, Inc., for the fiscal year ended December 31, 2015, dated March 28, 2016	No
G	U.S. Securities and Exchange Commission Form 10-K of Legacy Education Alliance, Inc., for the fiscal year ended December 31, 2017, dated April 2, 2018	No
H	U.S. Securities and Exchange Commission Form 8-K of Tigrent Inc., dated May 26, 2010	No
I	Spencer Fane LLP's Eighth Application for Interim Compensation and Reimbursement of Expenses in <i>In re Rich Global</i> and exhibits thereto, dated June 6, 2018	No
J	Tweet of Robert T. Kiyosaki, dated January 15, 2019	No
K	Tweet of Robert T. Kiyosaki, dated February 14, 2019	No
L	Tweet of Robert T. Kioysaki, dated February 26, 2019	No
M	Video Clip of Interview with Robert Kioysaki from Entrepreneur.com, Downloaded March 16, 2019—"So while some financial experts are saying get out of debt, I am saying learn how to use debt."	No
N	Video Clip of Interview with Robert Kioysaki from Entrepreneur.com, Downloaded March 16, 2019—"Debt and taxes make the rich richer."	No
O	Video Clip of Interview with Robert Kioysaki from Entrepreneur.com, Downloaded March 16, 2019—"Get out of debt is an obsolete idea. You should learn how to get into debt."	No
P	Video of full Interview with Robert Kioysaki from Entrepreneur.com, Downloaded March 16, 2019	No
Q	Chapter 7 Closed Cases and Total Receipts by State January 1, 2009 – December 31, 2009, Justice.gov (last accessed March 25, 2019)	No
R	AIRA Webinar, Business Valuation, Solvency Opinion, Bankruptcy Considerations, and <i>Daubert</i> , dated October 26, 2010	No
S	Chapter 7 Asset Cases Closed Calendar Year 2017, Justice.gov (last accessed March 25, 2019)	No
T	Garrett Sutton, <i>Own Your Own Corporation</i> , Chapter 6: "How a Charging Order Works to Your Advantage" (2001)	No

EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
U	“Meet the Rich Dad Advisors,” Richdad.com (last accessed March 20, 2019)	No
V	Garret Sutton, “Asset Protection for Gold, Silver And Precious Metals,” Corporatedirect.com, dated January 8, 2015	No
W	PageSix.com Staff, “Rich ‘Dad,’ bankruptcy Dad,” Pagesix.com (October 10, 2012)	No
X	Interest Rates and Fees, Federal Student Aid, U.S. Department of Education, Studentaid.ed.gov, (last accessed March 20, 2019)	No
Y	Robert Kiyosaki testimonial for Garrett Sutton, Sutlaw.com, dated June 10, 2014	No
Z	Proofs of Claim of Learning Annex, dated December 28, 2018	No
AA	Proof of Claim of Rich Global, LLC, dated December 28, 2012	No
BB	<i>Learning Annex Holdings, LLC, Learning Annex, LLC, and Learning Annex, L.P. v. Rich Global, LLC and Cashflow Technologies, Inc.</i> , Judgment, dated August 25, 2011	No
CC	<i>Learning Annex Holdings, LLC, Learning Annex, LLC, and Learning Annex, L.P. v. Rich Global, LLC and Cashflow Technologies, Inc.</i> , Judgment, dated July 17, 2012	No
DD	Plaintiffs’ Second Request for Production of Documents and Things to the Rich Dad Defendants, dated March 31, 2010	No
EE	Order Scheduling Settlement Conference in <i>Learning Annex Holdings, LLC v. Whitney Education Group, Inc.</i> , dated March 16, 2010	No
FF	Trustee’s Motion to Approve Settlement Pursuant to Rule 9019 F.R.B.P. and Notice Pursuant to Local Bankruptcy Rule 2002 in <i>In re: Rich Global, LLC</i> , dated November 1, 2012	No
GG	Special Verdict Form in <i>Learning Annex Holdings, LLC and Learning Annex, LLC v. Rich Global, LLC and Cashflow Technologies, Inc.</i> , dated June 8, 2012	No
HH	Objection of Learning Annex Holdings, LLC, Learning Annex, LLC and Learning Annex L.P. to Trustee’s Motion to Approve Settlement Agreement with Robert and Kim Kiyosaki with Exhibits K-O, dated November 25, 2012	No
II	Minutes of Proceeding in <i>In re: Rich Global, LLC</i> , dated December 11, 2012	No

EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
JJ	Rich Dad Events, "Free Real Estate Workshop Coming to: Tarrytown, White Plains & Yonkers March 28 – 30, 2019," Richdadfreeseinar.com (last accessed March 23, 2019)	No
KK	Affidavit of Michael R. Sullivan, dated October 14, 2011	Yes
LL	Condensed Transcript of Videotaped Deposition of Sharon Lechter, dated May 6, 2008	Yes
MM	Limited Liability Company Agreement of Rich Dad Education, LLC between Rich Global, LLC and Whitney Information Network, Inc., effective July 18, 2006	Yes
NN	Administrative Services Agreement between Whitney Education Group, Inc. and Rich Dad Education, effective July 18, 2006	Yes
OO	Rich Dad Operating Company, LLC Licensing Agreement between Rich Dad Operating Company, LLC, and Tigrent Inc., effective March 16, 2010	Yes
PP	License Agreement between Rich Global, LLC and Rich Dad Education, LLC	Yes
QQ	Termination of Rich Dad Operating Company License and Debt Conversion Agreement, effective September 1, 2013	Yes
RR	Emails from May 2015 re: Learning Annex v. Whitney Education et al.	Yes
SS	Mark-Up of Rich Dad Operating Company Tigrent Inc. Summary Document, dated January 8, 2010	Yes
TT	Letter from James E. May to Charles W. Lotzar Re: Rich Dad Education, LLC/Deferral of Licensing Fees, dated February 16, 2010	Yes
UU	Letter from James E. May to Steven C. Barre, Robert T. Kiyosaki, Michael R. Sullivan and Charles W. Lotzar and exhibits thereto, dated March 16, 2010	Yes
VV	Rich Dad Education, LLC Settlement Agreement and Release, effective March 16, 2010	Yes
WW	Intentionally Left Blank	ILB
XX	Rich Dad Operating Company, LLC Credit Agreement between Rich Dad Operating Company, LLC, and Rich Global, LLC, effective March 25, 2011	Yes
YY	Cashflow Technologies Inc. – BI Capital, LLC Licensing and Management Agreement, dated effective 29, 2006	Yes
ZZ	BI Capital, LLC – Rich Global, LLC Licensing and Management Agreement, effective April 20, 2007	Yes

EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
AAA	Minutes of Cashflow Technologies, Inc. Special Meeting of the Shareholders in Lieu of the Annual Meeting of the Shareholders, effective July 23, 2007	Yes
BBB	Lotzar Advice, dated October 11, 2017	Yes
CCC	Lotzar Advice—Edited, dated October 11, 2017	Yes
DDD	Cashflow Technologies, Inc. – BI Capital, LLC Restated Licensing and Management Agreement, effective January 1, 2008	Yes
EEE	Assignment of BI Capital, LLC – Rich Global, LLC Licensing and Management Agreement, effective December 24, 2008	Yes
FFF	Cashflow Technologies, Inc. and Rich Global, LLC Licensing Agreement, dated effective 1, 2009	Yes
GGG	Rich Dad Operating Company, LLC and Rich Global, LLC Management Agreement, effective January 1, 2009	Yes
HHH	Plaintiff’s Objections and Answers to Defendant Rich Dad Operating Company, LLC’s Second Set of Non-Uniform Interrogatories, dated June 19, 2017	Yes
III	Motion to Approve Settlement of Disputes Between the Trustee and Robert Kiyosaki, Kim Kiyosaki, Pele-Kala Corporation, Cashflow Technologies, Inc., BI Capital, LLC, and Rich Dad Operating Company, LLC, dated January 8, 2019	No
JJJ	Unsealed Copy of Objection of Learning Annex Holdings, LLC, Learning Annex, LLC and Learning Annex L.P. to Trustee’s Motion to Approve Settlement of Disputes between the Trustee and Robert Kiyosaki, Kim Kiyosaki, Pele-Kala Corporation, Cashflow Technologies, Inc., BI Capital, LLC, and Rich Dad Operation Company, LLC, dated February 15, 2019	Yes
KKK	Intentionally Left Blank	ILB
LLL	Plaintiff’s Corrected Response to Defendants’ Statement of Facts in Support of Defendants’ Motion for Partial Summary Judgment Re: Alter Ego Claims, dated September 10, 2018	No
MMM	Plaintiff’s Corrected Response to Defendants’ Statement of Facts in Support of Defendants’ Motion for Partial Summary Judgment Re: Fraudulent Transfer Claims, September 10, 2018	No
NNN	Reply to Learning Annex’s Objection to Motion to Approve Settlement, dated March 11, 2019	No
OOO	United States Patent and Trademark Office, “rich dad infinite return” (last accessed March 24, 2019)	No

EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
PPP	United States Patent and Trademark Office, “RICH DAD” (last accessed March 24, 2019)	No
QQQ	Civil Docket for Case #: 1:09-cv-04432-SAS-GWG	No
RRR	RDOC – Tigrent Licensing Financial Terms, effective March 16, 2010	Yes
SSS	Memorandum of Understanding for Tax Planning and Financial Reporting for the period ending December 31, 2009, signed by John Reedy, Tom Wheelwright, and Neil Dube	Yes
TTT	Letter from James R. Belcher to Tracy L. Zubrod Re: Rich Global, LLC, Bankruptcy case 12-20834 and Settlement, dated November 16, 2012	Yes
UUU	Outline of Facts Surrounding Rich Global Avoidance Claims from James R. Belcher to Tracy L. Zubrod, dated April 24, 2014	Yes
VVV	Robert Kiyosaki, <i>The Real Book of Real Estate</i> 145-148 (2009)	No
WWW	Opinion and Order in <i>Learning Annex Holdings, LLC and Learning Annex, LLC v. Rich Global, LLC, and Cashflow Technologies, Inc.</i> , dated July 11, 2011	No
XXX	Email from Philip A. Pearlman to Megan K. Bannigan and Michael Schaper Re: Learning Annex, dated December 18, 2018	No
YYY	Letter from James R. Belcher to Tracy L. Zubrod Re: Rich Global, LLC Bankruptcy Case 12-20834 Request for Information and Documents, dated April 1, 2014	Yes
ZZZ	Email from Sharon Lechter to John Kane Re: Russ Whitney, dated February 17, 2006	Yes
AAAA	Funding E-mails between Philip A. Pearlman, Megan K. Bannigan, and Michael Schaper – Feb. 14-15, 2019	No
BBBB	Rich Global, LLC Income Statement for the Twelve Months Ending December 31, 2007	Yes
CCCC	BI Capital LLC Balance Sheet December 31, 2007	Yes
DDDD	First Amended Verified Derivative Complaint, February 4, 2008	Yes
EEEE	CD of Video File	Yes
FFFF	Settlement Agreement and Mutual Release, dated August 27, 2008	Yes
GGGG	Transcript of Deposition of Sharon Lechter, dated November 19, 2009	Yes
HHHH	Nevada Secretary of State, Rich Dad Operating Company, LLC	Yes
IIII	2009 Cash Payments to the Kiyosakis	Yes

EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
JJJJ	Memorandum from Mr. Lotzar to Mr. Peck Re: Rich Dad Education Meetings schedule for June 3, 2009-June 5, 2009, dated May 29, 2009	Yes
KKKK	Escrow Account April 2010 to February 2011	Yes
LLLL	Rich Global, LLC Due (To) From Chart Rich Dad Operating Company, LLC	Yes
MMMM	License Agreement between Cashflow Technologies Inc. and BI Capital, LLC, dated December 1, 2009	Yes
NNNN	Affidavit of Sharon Lechter, dated August 4, 2008	Yes
OOOO	Condensed Transcript of Deposition of Sharon Lechter Vol. 2, dated June 26, 2008	Yes
PPPP	Verified Derivative Complaint, dated October 12, 2007	Yes
QQQQ	Letter from Sharon Lechter to Kim and Robert Kiyosaki, dated July 18, 2007	Yes
RRRR	E-mail from Anthony Humpage to Jennifer Carper, dated May 29, 2012	Yes
SSSS	Letter from Sharon Lechter to Kim and Robert Kiyosaki, dated July 18, 2007	Yes
TTTT	Letter from Neil Dube to Maureen Beyers and David Rosenbaum and attachments thereto, dated March 12, 2008	Yes
UUUU	Rich Global General Ledger for the Period from January 1, 2009 to December 31, 2009	Yes
VVVV	Two \$175,000 Royalty Checks to Robert and Kim Kiyosaki	Yes
WWWW	Wells Fargo Account Transaction and Balance Summary for the Statement Period of December 1 2007 to December 31, 2007	Yes
XXXX	\$9,000,000.00 Wire Authorization to the Credit Account of Sharon Lechter, dated September 3, 2008	Yes
YYYY	\$755,614.94 Wire Authorization from Kathy Stanton, dated Sept. 3, 2008	Yes
ZZZZ	Letter from Piper Hoskins to Kim Kioysaki, Re: Slight Transfer revision, dated December 26, 2008	Yes
AAAAA	G/L Transactions Listings, dated June 16, 2014	Yes
BBBBB	\$1,600,000.00 Wire Authorization to Jaimee, dated December 29, 2008	Yes
CCCCC	Intentionally Left Blank	ILB
DDDDD	Seven Unsecured Promissory Notes from Robert and Kim Kiyosaki to Rich Global, LLC, from January 22, 2009 December 9, 2009	Yes



EXHIBIT	DESCRIPTION	SUBJECT TO PROTECTIVE ORDER
EEEEEE	Intentionally Left Blank	ILB
FFFFF	Robert Kiyosaki, “Rich Dad Isn’t Bankrupt Dad: How Safe Are Your Assets?,” dated October 12, 2012	Yes
GGGGG	Plaintiff’s Objections and Responses to Defendant Cashflow Technologies Inc.’s Requests for Production of Documents to Plaintiff in <i>In re: Rich Global, LLC</i> , dated June 6, 2016	Yes
HHHHH	Deposition Designations for Lynton Kotzin, dated August 10, 2018	Yes
IIIII	Deposition Designations for Anthony C. Humpage, dated August 9, 2017	Yes
JJJJJ	Deposition Designations for James E. May, dated August 8, 2017	Yes
KKKKK	Deposition Designations for Lee M. Kutner, dated August 21, 2007	Yes
LLLLL	Deposition Designations for Sharon Lechter, dated October 16, 2017	Yes
MMMMM	Deposition Designations for Charles W. Lotzar, dated November 10, 2017	Yes
NNNNN	Deposition Designations for Michael R. Sullivan, dated December 4, 2017	Yes
OOOOO	Deposition Designations for Kim Louise Meyer Kiyosaki, dated December 5, 2017	Yes
PPPPP	Deposition Designations for Robert T. Kiyosaki, December 6, 2017	Yes
QQQQQ	Deposition Designations for Neil Dube, dated February 7, 2018	Yes
RRRRR	Deposition Designations for Tracy L. Zubrod, dated February 27, 2018	Yes

**LEARNING ANNEX WITNESS LIST**

Learning Annex **will** call:

1. Patrick Donovan, formerly of Cordes & Company

Learning Annex **may** call:

2. Lynton Kotzin (through life testimony deposition designation)
3. Anthony C. Humpage (through deposition designation)
4. James E. May (through deposition designation)
5. Lee M. Kutner (through deposition designation)
6. Sharon Lechter (through deposition designation)

7. Charles W. Lotzar (through deposition designation)
8. Michael R. Sullivan (through deposition designation)
9. Kim Louise Meyer Kiyosaki (through deposition designation)
10. Robert T. Kiyosaki (through deposition designation)
11. Neil Dube (through deposition designation)
12. Tracy L. Zubrod (through live testimony or deposition designation)
13. Any witness necessary to authenticate documents
14. Any witness necessary for impeachment or rebuttal
15. Any witness listed by any other party

Dated: March 26, 2019

Respectfully submitted,

/s/ Michael Schaper

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Attorneys for Learning Annex

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Learning Annex's Witness and Exhibit List for the April 2, 2019 Hearing on the Trustee's Motion for Settlement was served on March 26, 2019 by the Court's CM/ECF electronic service on all parties to the settlement agreement, the Chapter 7 Trustee and the Office of the United States Trustee and copies of all Exhibits were emailed to all parties to the settlement at the email addresses below.

Philip Pearlman  
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Attorneys for Robert and Kim Kiyosaki, Rich Dad Operating Company, LLC, Bi Capital, LLC, Fast Track, LLC, Pele-Kala Corporation, and Cashflow Technologies, Inc.

The attorneys listed above are shown on the Court's CM/ECF service list as representing the parties below their email addresses.

/s/ Michael Schaper  
\_\_\_\_\_  
Michael Schaper